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October 6, 2016

Hon. Vernon S. Broderick  
Thurgood Marshall  
United States Courthouse  
40 Foley Square, Court Room 518  
New York, NY 10007

**Re: *Paulino de la Cruz, et al v. Trejo Liquors, Inc. et al***  
**CA No. 16-cv-4382 (VSB)**

Your Honor,

We represent Defendants Trejo Liquors, Inc. and Johanny Trejo (collectively referred to as “Defendants”) in the above-referenced matter. We write to respectfully request an extension of time of one week to file our reply brief on the pending motion to dismiss, such that the due date would be October 13<sup>th</sup>. The request is being made as Defendants’ counsel is simultaneously briefing a summary judgment motion on behalf of six defendants due tomorrow, October 7<sup>th</sup>, 2016 in the action *Rosario v. Mis Hijos Deli Corp., et. al.* (15-CV-6049 (LTS) (DCF). Plaintiff would not be prejudiced by an extension of time of one week as this action is in its earliest stage. We reached out to Plaintiff’s counsel and were told that Mr. Harman was not in the office. This is the first request for an extension of time by Defendants.

The parties thank the Court for its attention to this matter.

Very truly yours,

/s/ Argilio Rodriguez  
Argilio Rodriguez, Esq.  
Counsel for Defendants